K. Chad Burgess
Director & Deputy General Counsel
Dominion Energy Southeast Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033 DominionEnergy.com



June 18, 2020

#### **VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29211

Re: South Bay at Mount Pleasant, LLC

Docket No. 2020-152-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC") is a Petition to Intervene in the above-referenced docket.

By copy of this letter DESC is providing a copy of the Petition to Intervene to the parties of record and encloses a certificate of service to that effect.

If you have any questions, please advise.

Very truly yours,

K. Chad Burgess

KCB/kms Enclosures

cc: G. Trenholm Walker, Esquire

Jeffrey M. Nelson, Esquire

Roger P. Hall, Esquire

Thomas P. Gressette, Jr., Esquire

Carri Grube Lybarker, Esquire

(all via electronic mail and U.S. First Class Mail w/enclosures)

#### **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF

### SOUTH CAROLINA

#### **DOCKET NO. 2020-152-E**

IN RE:

	)	
SOUTH BAY AT MOUNT	) PETITION TO INTERVENI	$\mathbf{E}$
PLEASANT, LLC	) <b>OF</b>	
	) DOMINION ENERGY SOU'	TH
	) CAROLINA, INC.	
	1	

Dominion Energy South Carolina, Inc. ("DESC" or "Company") hereby files with the Public Service Commission of South Carolina ("Commission") this Petition, pursuant to S.C. Code Ann. Reg. 103-825 (2012), and other applicable provisions of the Commission's Rules of Practice and Procedure, for permission to intervene in the above-captioned proceeding.

In support of this Petition, DESC respectfully would show unto the Commission the following key facts and would request and petition the Commission for the following relief:

1. DESC is a corporation organized and existing under the laws of the State of South Carolina and is headquartered in Cayce, South Carolina. More specifically, DESC is a combination utility engaged in the generation, transmission, distribution, and sale of electricity to the public for compensation as well as the distribution and sale of natural gas to the public for compensation.

- 2. By Petition dated June 15, 2020, South Bay at Mount Pleasant, LLC filed a Petition with Verification for Exception to Regulation 103-327(A).
- 3. DESC has a substantial and material interest in the subject matter of the above-captioned proceeding, in that the outcome of the proceeding will directly impact DESC. As a public utility, DESC is subject to the regulatory authority of the Commission pursuant to Title 58 of the Code of Laws of South Carolina. DESC's interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, DESC submits that good cause exists for the Commission to allow the Company to participate as a party in the above-captioned proceeding.
- 4. DESC opposes the request for exception to Regulation 103-327(A) filed by South Bay in this proceeding.
  - 5. Corporate legal counsel for DESC in this proceeding are as follows:

K. Chad Burgess, Esquire
Director & Deputy General Counsel
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Cayce, SC 29033-3701
Telephone: 803-217-8141
kenneth.burgess@dominionenergy.com

Matthew W. Gissendanner, Esquire Assistant General Counsel Dominion Energy South Carolina, Inc. Mail Code C222 220 Operation Way Cayce, SC 29033-3701

Telephone: 803-217-5359

matthew.gissendanner@dominionenergy.com

All correspondence and any other matters relative to this proceeding should be addressed to DESC's authorized representatives as stated hereinabove.

WHEREFORE, having set forth its Petition, DESC respectfully requests that the Commission issue an order (i) granting the Company's petition to intervene in this matter and participate fully in the Docket and any hearing to be scheduled in this matter, (ii) granting DESC all rights attendant to intervenor status, including the right to be provided copies of all filings, pleadings, testimony, and exhibits, and (iii) granting such other and further relief as is just and proper.

Respectfully submitted,

K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

Mail Code C222

220 Operation Way

Cayce, SC 29033-3701

Telephone: 803-217-8141 (KCB)

Telephone: 803-217-5359 (MWG)

Facsimile: 803-217-7931

kenneth.burgess@dominionenergy.com

matthew.gissendanner@dominionenergy.com

Attorneys for Dominion Energy South Carolina, Inc.

Cayce, South Carolina

June 18, 2020

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET	NO.	2020-	152-1

IN RF.

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South Bay at Mount Pleasant, LLC,	) ) )	CERTIFICATE OF SERVICE

This is the certify that I have caused to be served this day one (1) copy of Dominion Energy South Carolina, Inc.'s **Petition to Intervene** via electronic mail and U.S. First-Class Mail to the person named below at the address set forth:

Jeffrey M. Nelson, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 jnelson@ors.sc.gov

Carri Grube-Lybarker, Esquire S.C. Department of Consumer Affairs PO Box 5757 Columbia, SC 29250 clybarker@scconsumer.gov

G. Trenholm Walker, Esquire
Walker Gressette Freeman & Linton, LLC
PO Box 22167
Charleston, SC 29413
walker@WGFLLAW.com

Roger P. Hall, Esquire
S.C. Department of Consumer Affairs
PO Box 5757
Columbia, SC 29250
rhall@scconsumer.gov

Thomas P. Gressette, Jr., Esquire
Walker Gressette Freeman & Linton, LLC
PO Box 22167
Charleston, SC 29413
gressette@WGFLLAW.com

Karen M. Scruggs

Cayce, South Carolina

This 18th day of June 2020